

CHAITMAN LLP

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Objection Deadline: November 18, 2016

Reply Deadline: December 2, 2016

*Attorneys for Participating Claimants on Exhibit
A annexed hereto*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION

CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**JOINDER TO MOTION IN LIMINE TO EXCLUDE HEARSAY STATEMENTS
REGARDING PROFIT WITHDRAWALS, AND TO LIMIT THE PROPOSED
TESTIMONY OF LISA M. COLLURA AND MATTHEW B. GREENBLATT**

Participating Claimants listed on Exhibit A annexed hereto, represented by Chaitman LLP (“Participating Claimants”), join the motion in limine of Doctors Joel and Norman Blum, filed on October 28, 2016, through their attorneys, Baker & McKenzie, LLP to exclude hearsay statements regarding profit withdrawals and to limit the proposed testimony of Lisa M. Collura and Matthew B. Greenblatt (the “Blum Motion”). [ECF No. 14361].

BASIS FOR JOINDER

1. The Trustee offers hearsay statements and expert reports that do not comply with the Federal Rules of Evidence to deny Participating Claimants' SIPC claims.
2. To avoid duplicative briefing, Participating Claimants join the Blum Motion.

CONCLUSION

The Participating Claimants respectfully request that the Court grant the Motion of Doctors Joel and Norman Blum, filed on October 28, 2016, through their attorneys, Baker & McKenzie, LLP to exclude hearsay statements regarding profit withdrawals and to limit the proposed testimony of Lisa M. Collura and Matthew B. Greenblatt.

Dated: New York, New York
October 28, 2016

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
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*Attorneys for Participating Claimants on
Exhibit A annexed hereto*

CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2016, I caused a true and correct copy of the foregoing document to be served upon the parties in this action who receive electronic service through CM/ECF and by electronic mail upon:

BAKER & HOSTETLER LLP

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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*

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*Attorneys for Participating Claimants on
Exhibit A annexed hereto*